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July 6, 2011

Via Electronic Mail

Sylvia A. Goldsmith
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Via Electronic Mail

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Dallas, Texas 75251-2242

Re: No. 4:11-cv-00126-MHS, *Steven W. Haberman v. PNC Mortgage, et al.*, In the
United States District Court for the Eastern District of Texas, Sherman Division

Dear Jim and Sylvia:

Enclosed please find PNC Mortgage's Objections and Responses to Plaintiff's Requests for Production of Documents.

Notwithstanding the objections made to the requests in the above referenced document, at this early stage of the case, as reflected by our previous request for additional time to respond to Plaintiff's requests, we have been unable to confirm the credit pulls referenced in Plaintiff's complaint, despite a diligent search for this information. Consequently, we are unable to produce documents responsive to most of Plaintiff's requests at this time. We are continuing to diligently search for the information and will supplement immediately upon obtaining the relevant information or documents requested by Plaintiff.

Given the state of PNC's investigation of the claims at this time, we have insufficient information to allow an accurate assessment of the case to respond to Plaintiff's settlement demand.

Thanks for your sincere cooperation in this matter.

Columbus | Washington | Cleveland | Cincinnati | Akron | Houston

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Very truly yours,



Latosha Lewis Payne

LLP/lmb
Enclosure